

THE HONORABLE JUDGE RICARDO S. MARTINEZ

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

DERICK D’HAITI,

Plaintiff,

NO. 2:20-CV-00358-RSM

v.

STIPULATED MOTION AND ORDER
FOR CONTINUANCE OF DEADLINE TO
JOIN ADDITIONAL PARTIES

PHILIPS NORTH AMERICA LLC d/b/a
PHILIPS HEALTHCARE, a Delaware
limited-liability company; ABC Company and
XYZ Company,

NOTE FOR MOTION CALENDAR:
June 11, 2020

Defendants.

STIPULATED MOTION

The parties in the above-captioned action, Derick D’Haiti (hereinafter “Plaintiff”) and Philips North America LLC d/b/a Philips Healthcare (hereinafter “Philips”), by and their undersigned counsel of record, hereby submit this stipulated motion pursuant to LCR 10(g) to continue the dead to join additional parties from June 15, 2020 to August 15, 2020.

Plaintiff in this matter alleges that on December 24, 2018, while working at a Philips building, he slipped and fell on a freshly waxed floor. Plaintiff further alleges that he suffered injuries because of the fall and that the incident was caused due to Philips negligent actions.

STIPULATED MOTION FOR CONTINUANCE OF
DEADLINE TO JOIN ADDITIONAL PARTIES
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HOLT WOODS & SCISCIANI LLP
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Philips is attempting to identify the individuals who waxed the floor and their employer and requests an additional sixty (60) days to identify the individual's employer and join it as a potential party in this litigation. This is the parties first request for an extension of case deadlines and is not the result of lack of diligence, as the parties have exchanged written discovery and are awaiting responses.

Therefore, the parties stipulate to a continuance of the deadline to join additional parties from June 15, 2020 to August 15, 2020.

IT IS SO STIPULATED:

EMERALD LAW GROUP, PLLC

HOLT WOODS & SCISCIANI LLP

s/ Donna L. Mack

s/ Charissa R. Williams

Donna L Mack, WSBA No. 30875
Attorney for Plaintiff

Anthony R. Scisciani III, WSBA No. 32342
Kelsey L. Shewbert, WSBA No. 51214
Charissa R. Williams, WSBA No. 54879
Attorneys for Philips North America LLC
d/b/a Philips Healthcare

IT IS SO ORDERED:

Based on the foregoing Stipulation, IT IS HEREBY ORDERED that the deadline to join additional parties shall be continued until August 15, 2020.

DATED this 12th day of June, 2020.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I certify under penalty of perjury under the laws of the State of Washington, that the following is true and correct:

I am employed by the law firm of Holt Woods & Scisciani LLP.

At all times hereinafter mentioned, I was and am a citizen of the United States of America, a resident of the State of Washington, over the age of eighteen (18) years, not a party to the above-entitled action, and competent to be a witness herein.

On the date set forth below I served the document(s) to which this is attached, in the manner noted on the following person(s):

PARTY/COUNSEL	DELIVERY INSTRUCTIONS
<u>CO / Plaintiff</u> Donna L. Mack, WSBA No. 30875 Emerald Law Group, PLLC 811 1 st Avenue, Suite 510 Seattle, WA 98104-1428	<input type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via E-Mail <input type="checkbox"/> Via Facsimile <input type="checkbox"/> Via Overnight Mail <input checked="" type="checkbox"/> Via CM/ECF donna@emeraldllawgroup.com

DATED this 11th day of June, 2020.

s/ Jessica Heath

Jessica Heath, Legal Secretary